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ETAD

ETAD North America

Representing the North American Dyes Industry

June 6, 2003

RETURN RECEIPT REQUESTED, PLEASE, BY E-MAIL

Christine Todd Whitman, Administrator
U.S. Environmental Protection Agency
P.O. Box 1473
Merrifield, VA 22116

ATTN: Chemical Right-to-Know Program

RE: **Response to comments on test plan pursuant to the High Production Volume challenge for Acetamide, N-[5-[bis[2-(acetyloxy)ethyl]amino]-2-[(2-bromo-4,6-dinitrophenyl)azo]-4-methoxyphenyl]-(i.e., C.I. Disperse Blue 79:1) CAS No. 3618-72-2**

Dear Administrator Whitman:

The ETAD North America Disperse Blue 79:1 consortium (formerly USOC/ETAD Disperse Blue 79:1 consortium) is pleased to submit this response to the public comments on the test plan and robust summary for Acetamide, N-{5-(bis[2-acetyloxy)ethyl]amino]-2-[(2-bromo-4,6-dinitrophenyl)azo]-4-methoxyphenyl]- (i.e., C.I. Disperse Blue 79:1), CAS No. 3618-72-2.

A revised test plan, robust summary, and test plan justification for Disperse Blue 79:1 are enclosed, incorporating the comments made by Environmental Defense and the EPA. The summary table for the test plan, Table 1, has been revised also in response to the comments. A summary of the specific changes made is presented below.

Response to Comments

1. Chemical purity information is provided in Section 1.1.C of the robust summary.
2. Where appropriate, the robust summary is changed to indicate clearly whether data are for Disperse Blue 79:1 or the analog, Disperse Blue 79.
3. A level III fugacity model is added to Section 3.3.1 to predict partitioning behavior of Disperse Blue 79:1 in the environment.
4. A separate robust summary is provided in Section 5.8 for the reproductive toxicity endpoint using data from the repeated-dose and developmental toxicity studies.

Use and Exposure Information

Environmental Defense, in its comments, also encouraged us to provide use and exposure data on Disperse Blue 79:1 to allow evaluation of possible consumer exposure. Although the use of Disperse Blue 79:1 is limited to coloring polyester textile substrates only, such that no consumer exposure would be expected, the following summary of manufacturing and commercial applications is provided in response to ED's comments.

Ecological and Toxicological Association of Dyes and Organic Pigments Manufacturers
1850 M Street, N.W., Suite 700 • Washington, D.C. 20036 • (202) 721-4100 • Fax (202) 296-8120 • www.etad.com

Manufacturing/Importing
C.I. Disperse Blue 79:1 is imported into the United States either as a finished product or as a presscake, which is then converted to a finished product by the addition of dispersing agents. To the best of our knowledge, Disperse Blue 79:1 is no longer manufactured domestically in the U.S.

Commercial Applications
C. I. Disperse Blue 79:1 is an organic dye used to color polyester textile substrates. It provides a deep navy color often used as a basis for black shades on polyester. End use of these substrates is almost entirely in apparel, either in 100% polyester articles or in combination with other fibers such as cotton.

Shipping/Distribution
C.I. Disperse Blue 79:1 is shipped throughout the world from manufacturing or distribution centers.

Worker/Consumer Exposure
The textile dye industry has a long safety record in handling these chemicals by both the manufacturers and users. Exposure of workers handling C.I. Disperse Blue 79:1 is likely to be highest in the area of packaging at the manufacturing site and during raw material weigh-up at the customer site. These materials are produced as granules, dust-suppressed powders, and aqueous pastes. Thus, during the above operations, there is some potential for inhalation exposure and dermal contact, although the form of the product and use of work practices and protective equipment minimizes worker exposure.

There is little or no potential for consumer exposure. The dyeing process requires high temperature resulting in the incorporation of the dye molecules into the polyester substrate. Accordingly, although skin contact with the fabric would occur, release of dye molecules would not be expected.

Sponsoring member companies of this consortium are: Blackman Uhler Chemical Company, Ciba Specialty Chemicals Corporation, Clariant Corporation, and DyStar L.P.

ETAD North America represents the interests of dye manufacturers and formulators in the NAFTA Region. Its parent organization, the Ecological and Toxicological Association of Dyes and Organic Pigments Manufacturers (ETAD), is an international technical organization that addresses the health, environmental, and safety aspects of the worldwide colorants manufacturing industry.

The undersigned is technical contact for all matters pertaining to this HPV submission. He can be reached at 202-721-4154 or by e-mail at helmest@socma.com.

Sincerely,

C. Tucker Helmes, Ph.D.
Executive Director

Enclosures
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